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By ECF

September 1, 2020

Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Case No. 16-cr-00680-GHW, U.S. v. Madrid

Dear Judge Woods:

The above matter is scheduled for sentencing before Your Honor on September 9, 2020. It is respectfully requested that the matter be adjourned to a date in mid-February 2021, or any date thereafter convenient with the Court and parties. Prior to the current health crisis, counsel for the Defendants and the Government had multiple meetings in an effort to come to agreement on what non-binding sentence the parties would be urging the court to impose. Those efforts terminated upon the closure of the courts for all but time sensitive matters.

Concurrent with the court closure the Federal Metropolitan Detention Center in Brooklyn, where both defendants are incarcerated, became unavailable for inmate visits save for telephonic interviews that were, and remain, difficult to schedule. In addition, air travel for counsel to New York became high risk for those who may have compromised medical conditions.

As the city reopens and travel becomes less medically threatening, counsel hope to be able to resume visitation with the defendants in preparation for the anticipated sentencing date suggested. Accordingly, all counsel for defendants and the Government request the sentencing be continued to a date in mid-February 2021, or any date thereafter convenient with the court.

I have informed all counsel and there is no objection to this request.

Respectfully submitted,
^{/s/}
Jan Edward Ronis,
Gretchen C. von Helms,
Guadalupe Valencia

cc: Assistant United States Attorney, Rebekah Allen Donaleski (By ECF and email)